

EXHIBIT 15

LeDoux/Outliers, Inc. et al. - Request for Conference; Anand and Lujajohnson Subpoenas

1 message

Rick Houghton <rhougton@mbssmartlaw.com>

Mon, Apr 7, 2025 at 6:52 PM

To: Jocelyn Stewart <jocelyn@ucmj-defender.com>, Talis Abolins <tabolins@mctlaw.com>

Cc: David Fisher <dfisher@mgmlaw.com>, Joshua Severit <jseverit@mgmlaw.com>, Jeremy Roller <jroller@aretelaw.com>, Christian McGuire <cmcguire@mbssmartlaw.com>, "jen@ucmj-defender.com" <jen@ucmj-defender.com>, Kevin Craig <kcraig@grsm.com>

Hi Jocelyn and Talis,

As mentioned, my firm represents Anand and Lujajohnson in connection with the subpoenas that they recently received. The subpoenas are deficient for at least the following reasons:

- Failure to effect proper service.
- Failure to provide proper notice.
- Failure to allow a reasonable time for compliance.
- Failure to specify a proper place for compliance.
- Cites to Washington, not federal, law.
- Seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.
- Overbroad in scope.
- Seeks information regarding protected matters.

As a result, Anand and Lujajohnson intend to move to quash the subpoenas in the applicable federal districts.

Please let me know whether LeDoux will withdraw the subpoenas based on the identified deficiencies or, if not, when you are available to confer. We intend to move to quash by end of day April 10 given the subpoenas' compliance deadline.

I am available to confer tomorrow (4/8) from 1pm to 3:30pm PST, Wednesday (4/9) from 8:30am to 10am PST and from 11am PST to 3pm PST, and Thursday (4/10) from 8:30am to 9:45am PST and from 11:30 am to 3pm PST.

Please advise when you are available.

Thank you,

Rick

Rick Houghton | Partner
Murphy Ball Stratton LLP
c: 412.721.7482

Attorney-client privileged and confidential